

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

SANDRA C. TORRES, INDIVIDUALLY  
AND AS MOTHER AND  
REPRESENTATIVE OF THE ESTATE  
OF DECEDENT, E.T., AND AS NEXT  
FRIEND OF E.S.T., MINOR CHILD; ELI  
TORRES, JR.; and JUSTICE TORRES,

*Plaintiffs,*

v.

DANIEL DEFENSE, LLC; DANIEL  
DEFENSE, INC; OASIS OUTBACK,  
LLC; CITY OF UVALDE; UVALDE  
CONSOLIDATED INDEPENDENT  
SCHOOL DISTRICT; UVALDE  
COUNTY; UVALDE CONSOLIDATED  
INDEPENDENT SCHOOL DISTRICT  
POLICE DEPARTMENT (“UCISD-PD”)  
CHIEF PEDRO ‘PETE’ ARREDONDO;  
UVALDE POLICE DEPARTMENT  
(“UPD”) LIEUTENANT AND ACTING  
CHIEF MARIANO PARGAS; FORMER  
UPD OFFICER AND UCISD SCHOOL  
BOARD MEMBER JESUS “J.J.”  
SUAREZ; UPD SERGEANT DANIEL  
CORONADO; UPD OFFICER JUSTIN  
MENDOZA; UPD OFFICER MAX  
DORFLINGER; UVALDE COUNTY  
SHERIFF RUBEN NOLASCO; UVALDE  
COUNTY CONSTABLE EMMANUEL  
ZAMORA; UVALDE COUNTY  
CONSTABLE JOHNNY FIELD; TEXAS  
DEPARTMENT OF PUBLIC SAFETY  
(“TDPS”) CAPTAIN JOEL  
BETANCOURT; TDPS SERGEANT  
JUAN MALDONADO; TDPS RANGER  
CHRISTOPHER KINDELL; and DOES 1-  
119,

*Defendants.*

CIVIL ACTION NO. 2:22-CV-00059-  
AM-VRG

NOTICE OF WITHDRAWAL OF  
MOTION TO DISMISS WITHOUT  
PREJUDICE UNDER FED. R. CIV. P.  
41(a)(2)

**Plaintiffs' Notice of Withdrawal of Motion to Voluntarily Dismiss Under Federal Rule of Civil Procedure 41(a)(2) Without Prejudice**

Plaintiffs hereby withdraw their currently pending motion pursuant to Rule 41(a)(2), which was filed on February 23, 2023. The motion was premised on the pendency in the Austin Division of multiple related lawsuits arising out of the Uvalde school shooting and raising similar claims against similar defendants, and the judicial efficiency and economy from having all the related lawsuits heard together. Yesterday, those lawsuits were transferred from the Austin Division to the Del Rio Division (those orders are attached hereto as Exhibit A). Accordingly, the basis for Plaintiffs' Rule 41(a)(2) motion is no longer applicable, and judicial efficiency and economy will be served by keeping this lawsuit here in the Del Rio Division along with the other cases. Plaintiffs therefore respectfully that their Rule 41(a)(2) motion be deemed withdrawn.

DATED: March 2, 2023

Respectfully Submitted,

/s/ Molly Thomas-Jensen

**EVERYTOWN LAW**

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### CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2023, I served the following counsel through electronic service (ECF) as authorized by Fed. R. Civ. Pro. 5:

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Counsel for Defendant, Daniel Defense, LLC (fka Daniel Defense, Inc.)

I hereby certify that on the following defendants in this action will be served in accordance with Fed. R. Civ. Pro. 5(b) either personally, by mail, or electronic mail:

Oasis Outback, LLC;  
City Of Uvalde;  
Uvalde Consolidated Independent School District;  
Uvalde County;  
Uvalde Consolidated Independent School District Police Department (“UCISD-PD”);  
Chief Pedro ‘Pete’ Arredondo;  
Uvalde Police Department (“UPD”);  
Lieutenant and Acting Chief Mariano Pargas;  
Former UPD Officer and UCISD School Board Member Jesus “J.J.” Suarez;  
UPD Sergeant Daniel Coronado;  
UPD Officer Justin Mendoza;  
UPD Officer Max Dorflinger;  
Uvalde County Sheriff Ruben Nolasco;  
Uvalde County Constable Emmanuel Zamora;  
Uvalde County Constable Johnny Field;  
Texas Department Of Public Safety (“TDPS”) Captain Joel Betancourt;  
TDPS Sergeant Juan Maldonado;  
TDPS Ranger Christopher Kindell

/s/ Molly Thomas-Jensen

Molly Thomas-Jensen